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*Attorneys for Debtors
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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION FOR ORDER
CONTINUING BRIEFING AND HEARING
SCHEDULE REGARDING
CLASSIFICATION OF FIRE CLAIMS OF
FEDERAL AGENCIES AND OF
CALIFORNIA STATE AGENCIES**

Related Docket No.: 6010

[No Hearing Date Requested]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtor and debtor in
2 possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11**
3 **Cases**”), certain funds and accounts managed or advised by Abrams Capital Management, LP, and
4 certain funds and accounts managed or advised by Knighthead Capital Management, LLC
5 (together, the “**Shareholder Proponents**” and with the Debtors, the “**Plan Proponents**”), the
6 Federal Agencies, and the California State Agencies, by and through their respective undersigned
7 counsel, hereby submit this stipulation (the “**Stipulation**”) amending the Scheduling Order (as
8 defined below).¹ The Debtors, the Shareholder Proponents, the Federal Agencies, and the
9 California State Agencies are referred to in this Stipulation collectively as the “**Parties**,” and each
10 as a “**Party**.” The Parties hereby stipulate and agree as follows:

11 **RECITALS**

12 A. On March 2, 2020, the United States Bankruptcy Court for the Northern
13 District of California entered the *Order Approving Stipulation for Order Establishing Briefing and*
14 *Hearing Schedule Regarding Classification of Fire Claims of Federal Agencies and of California*
15 *State Agencies* [Docket No. 6010] (the “**Scheduling Order**”), which set forth, among other things,
16 the following briefing and hearing scheduling on the Classification Issue: (i) the deadline for the
17 Parties to file opening briefs would be March 13, 2020 (the “**Opening Brief Deadline**”), (ii) the
18 deadline for Parties to file responsive briefs would be March 25, 2020 (the “**Reply Deadline**”), and
19 (iii) the hearing on the Classification Issue would be held on April 1, 2020 (the “**Hearing**”).

20 B. In light of tentative settlements in principle reached among the Debtors, the
21 Official Committee of Tort Claimants (the “**TCC**”), and the Federal Agencies and the Debtors, the
22 TCC, and the California State Agencies, the Parties have agreed to continue the briefing and hearing
23 schedule on the Classification Issue set forth in the Scheduling Order.

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28 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the
Scheduling Order (as defined herein).

1 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
2 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
3 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
4 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE BANKRUPTCY**
5 **COURT TO ORDER, THAT:**

6 1. The Opening Brief Deadline, the Reply Deadline, and the Hearing, are
7 continued indefinitely until such time as (i) the Bankruptcy Court enters an order approving
8 settlements between the Debtors, the TCC, and the Federal Agencies and between the Debtors, the
9 TCC, and the California State Agencies that resolve the Classification Issue, at which time the
10 matter will be taken off the Bankruptcy Court's calendar, with prejudice, or (ii) the Bankruptcy
11 Court issues an order further amending the Scheduling Order.

12 2. Except as expressly set forth herein, all other provisions of the Scheduling
13 Order shall remain in full force and effect and shall not be impacted by this Stipulation.

14 3. This Stipulation shall constitute the entire agreement and understanding of
15 the Parties relating to the subject matter hereof and shall supersede all prior agreements and
16 understandings relating to the subject matter hereof.

17 4. This Stipulation may be executed in counterparts, each of which shall be
18 deemed an original but all of which together shall constitute one and the same agreement.

19 5. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
20 controversies arising from this Stipulation.

1 Dated: March 13, 2020

2 WEIL, GOTSHAL & MANGES LLP
3 KELLER BENVENUTTI KIM LLP

4 /s/ Thomas B. Rupp
5 Thomas B. Rupp
6 *Attorneys for the Debtors*

Dated: March 13, 2020

JONES DAY

/s/ Joshua M. Mester
Joshua M. Mester
Attorneys for the Shareholder Proponents

7 Dated: March 13, 2020

8 FELDERSTEIN FITZGERALD
9 WILLOUGHBY PASCUZZI & RIOS LLP

10 /s/ Paul J. Pascuzzi
11 Paul J. Pascuzzi
12 *Attorneys for the California State Agencies*

Dated: March 13, 2020

UNITED STATES DEPARTMENT OF
JUSTICE, CIVIL DIVISION

/s/ Matthew J. Troy
Matthew J. Troy
Attorneys for the Federal Agencies